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COMMUNICATIONS

CONTENTS

FIVE COPIES EACH OF THE FOLLOWING:

1. **Cover letter** to FCC from Petitioner
2. **Counter Proposal**, pages 1 & 2
3. **Engineering Statement** on behalf of Lookout Mountain Broadcasting, pages 1, 2, & 3
4. **Exhibit I**, pages 1, 2, & 3 (**Commercial FM Separation Study**)
5. **Exhibit II, Map** of proposed transmitter site and 70 dBu coverage, one page
6. **Exhibit III, Map** of 56.1 degree radial, one page
7. **Exhibit IV, Contour Calculations**, Channel 254 A

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DOCKET FILE COPY ORIGINAL

Leeta M. McDougald
P.O. Box 1187
Rome, GA 30162

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A Petitioner
Representing
Lookout Mountain Broadcasting

August 15, 1994

Federal Communications Commission
Washington, D.C. 20554

*Ref: Amendment of Section 73.202(b), Table of Assignments, FM Broadcast Stations,
Lookout Mountain, Georgia [Docket No. 94-64] RM 8453*

Attached herewith please find five (5) copies of a Counter Proposal and Exhibits to MM Docket No. 94-64 RM8453 which seeks to reassign FM Channel 254A to Lookout Mountain, Georgia as an amendment of Section 73.202(b) of the commission's Rules.

A copy of this filing has been forwarded to:


Deborah M. Thompson
Route 5, Box 881
Scottsboro, AL 35768

Kirk A. Tollett
4001 Highway 78
Jasper, AL 35501

If there are questions concerning this filing, please contact me at the address above (Box 1187, Rome, GA 30162) or by telephone at [706] 291-9742.

Sincerely,

Lookout Mountain Broadcasting


Leeta M. McDougald
Petitioner

Materials Attached

Before The
Federal Communications Commission
Washington, D.C. 20554

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AUG 18 1994
COMMUNICATIONS SECTION

In the Matter of)
)
Amendment of Section 73.202(b)) Docket No. 94-64
Table of Assignments,) RM 8453
FM Broadcast Stations)
Lookout Mountain, Georgia)

To: Chief, Policy and Rules Division

COUNTER PROPOSAL
to
MM DOCKET NO. 94-64 RM8453

Lookout Mountain, Georgia, (hereinafter "Petitioner"), pursuant to section 1.401 of the Commission's Rules, respectfully petitions the Commission to institute a rulemaking proceeding looking toward the assignment of FM Channel 254A to Lookout Mountain, Georgia, and amend Section 73.202(b) of the Commission's Rules as follows:

City	Channel Number	
	Present	Proposed
Lookout Mountain, Georgia	-0-	254A

In support whereof, the following is shown:


1. As reflected in the attached technical exhibit, the requested assignment of FM Channel 254A at Lookout Mountain, Georgia, can be made in full compliance with all applicable minimum mileage separations and other technical requirements under the Commission's Rules. Further, Channel 254A can be assigned to Lookout Mountain, Georgia, without any other changes in the Table of Assignments.

2. It is the long standing policy of the Commission as mandated by Congress to allow the most efficient use of available spectrum in order to advance the public interest, convenience, and necessity. There is no FM broadcast facility currently licensed to Lookout Mountain, GA. Therefore, if adopted, this proposal would provide **first local service** to the community of Lookout Mountain, Georgia.

3. As can be ascertained from the attached declaration, if Channel 254A is allocated to Lookout Mountain, GA, petitioner will promptly apply for a construction permit for the new FM broadcast station and if a construction permit is granted, petitioner will promptly construct and operate the station for which it is licensed.

WHEREFORE, for the foregoing reasons, the Commission should amend Section 73.202(b) of its Rules by allocating FM Channel 254A to Lookout Mountain, Georgia.

Respectfully Submitted


Leeta M. McDougald
Lookout Mountain, Georgia
Petitioner

DATE: August 11, 1994

Mailing Address & Telephone:
Leeta M. McDougald
P.O. Box 1187
Rome, GA 30162
Daytime Telephone: 706-291-9742

ENGINEERING STATEMENT
ON BEHALF OF
LOOKOUT MOUNTAIN BROADCASTING
LOOKOUT MOUNTAIN, GEORGIA

INTRODUCTION:

This Engineering Statement has been prepared on behalf of the petitioner in support of a counter proposal to assign 254-A to Lookout Mountain, Georgia, in full compliance with the minimum distance separation required between stations in Rule 73:207. This assignment can be made to Lookout Mountain, Georgia without any other changes in the table of assignments as amended. This proposal, however, is in conflict with the one prepared for Ider, Alabama. Therefore, it is considered a counter proposal to Ider, Alabama, RM-8453.

ALLOCATION STUDY:

A computer allocation study has been made to determine that this channel can be utilized at Lookout Mountain, Georgia. That allocation study is attached to this engineering statement as **Exhibit 1**. The petitioner is familiar with the area and feels that she can find a site for the antenna and transmitter in the area of the following coordinates, N. Lat. 34-51-16 W. Lng. 85-33-14. This site meets all the special requirements of the rules concerning the assignment of 254-A to Lookout Mountain, Georgia.

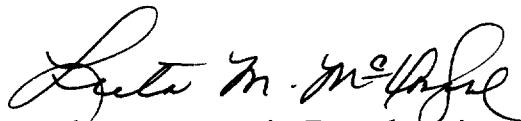
CONTOUR CONSIDERATION:

Exhibit 2 is a computer generated map which illustrates that this channel, operating as a full Class A, can comply with the minimum spacing requirement of 73:207 and place a city grade contour over the city of Lookout Mountain, Georgia. **Exhibit 3** shows the area where the antenna and transmitter can be located. In order to determine that a city grade contour would be provided to the city from the hypothetical coordinates, a terrain study was conducted from those coordinates and the procedures set out in the Commission's Rules were utilized. **Exhibit 2** confirms that this counter proposal complies with the 73:315, and places a 70dBu contour over the complete city of Lookout Mountain, Georgia. **Exhibit 4** is a tabulation of all five radials utilized in this study. These tabulations give the average elevation from 3 to 16 kilometers in meters AMSL, the effective antenna height in meters above AAT, and the distance to the 70dBu city grade contour and the 60dBu service grade contour. When determining the Average Elevation above the terrain, only the eight cardinal radials were utilized. The fifth radial, which is the one going through the center of Lookout Mountain, Georgia was not included in the average.

CONCLUSION:

Based on this information, it appears that this channel can be assigned to Lookout Mountain, Georgia, as a Class A and complies with the Commission's Rules 73:207 and 73:315. In addition, it will be far more beneficial to the general public to assign this channel to Lookout Mountain, Georgia, than Ider, Alabama, because a greater number of people would receive service from the 1.0mV/m. The proposal for Ider, would only cover 60,795 people, whereas the proposal for Lookout Mountain, Georgia would serve 107,156 people. This shows a gain of over 46,795 persons. The 1990 population of Ider, Alabama was 671. Lookout Mountain, Georgia's 1990 population was 1,636. Therefore the petitioner requests the amendment of the Federal Communication Commission Table of Assignments 73:202(b), by assigning **Channel 254-A** to Lookout Mountain, Georgia in lieu of Ider, Alabama. When this channel is assigned to Lookout Mountain, the petitioner will promptly apply for a construction permit to construct a Full Class A station at Lookout Mountain, Georgia.

Leeta M. McDougald, Petitioner



Lookout Mountain Broadcasting
Lookout Mountain, Georgia
Petitioner

DATE: August 11, 1994

Address and Telephone Number:

Leeta M. McDougald

P.O. Box 1187

Rome, GA 30162

Day: [706] 291-9742

Fax:[706] 291-7155

LOOKOUT MOUNTAIN, GA

Reference Point: N Latitude 34-51-16 W Longitude 85-33-14

COMMERCIAL FM SEPARATION STUDY FOR CHANNEL 254 A, 98.7 MHz

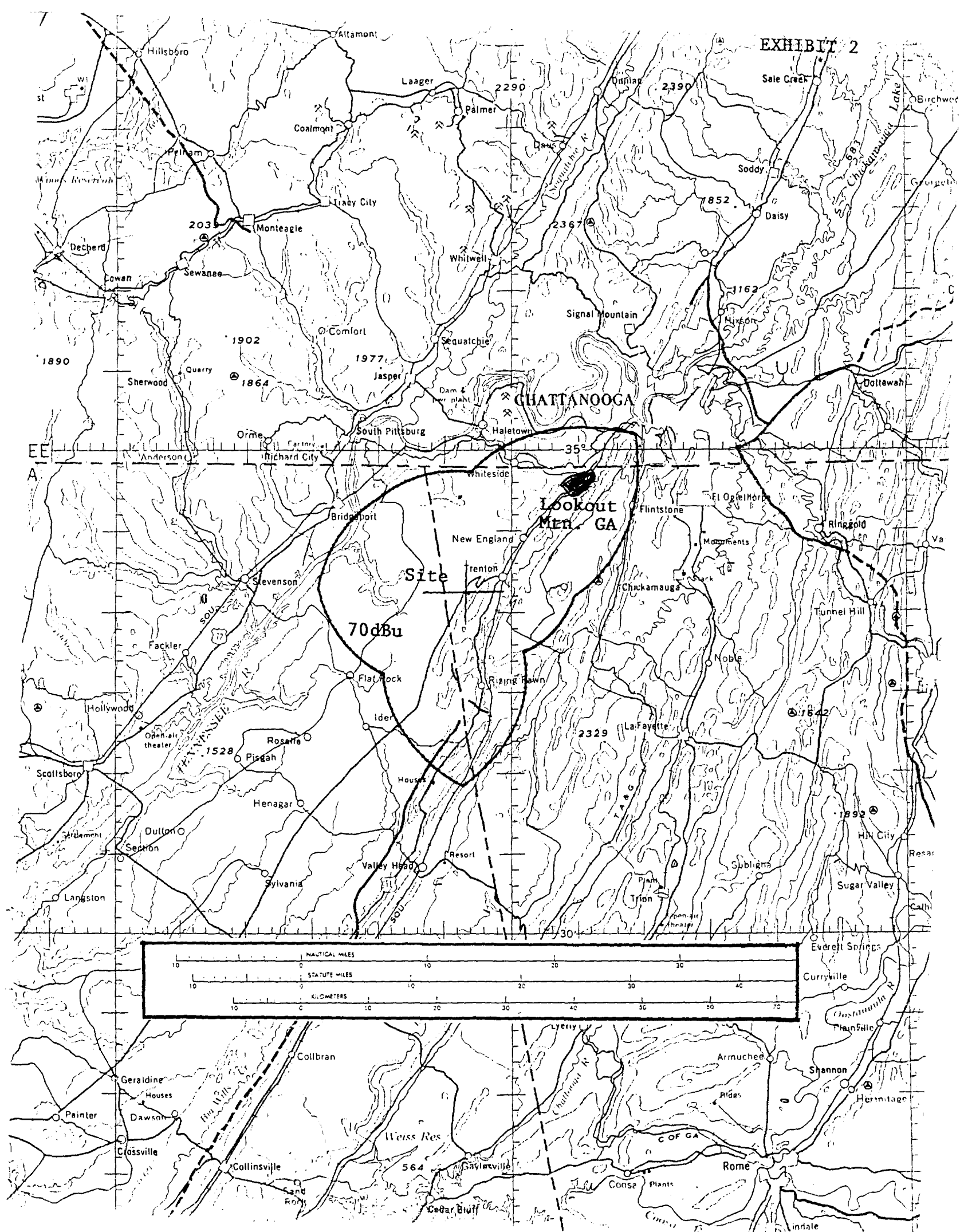
Chan	Call	City	State	CL	TYP	Latitude	Longitude	D(Km)	D(Mi)
251	WTXT	Fayette	AL	C1	LI	33-19-17	87-46-29	266.3	165.5
251	W251	Capshaw	AL	D	CP	34-49-05	86-44-17	108.4	67.4
251		Valley	AL	A	AS	32-55-27	85-12-48	216.4	134.5
251	NEW-	Birmingham	AL	D	AP	33-29-04	86-48-25	190.9	118.6
251		Fayette	AL	C1	AS	33-19-17	87-46-29	266.3	165.5
251	WUAF	Valley	AL	A	AP	32-55-34	85-13-42	216.0	134.2
251	NEW-	Montgomery	AL	D	AP	32-21-32	86-19-57	286.1	177.8
251	WUAF	Valley	AL	A	CP	32-55-12	85-13-04	216.8	134.7
251	WEIZ	Hogansville	GA	C3	AD	33-06-56	85-05-11	197.7	122.8
251		Seneca	SC	C	AS	34-41-11	82-59-27	235.4	146.3
251	WVSM	Seneca	SC	C	LI	34-41-14	82-59-12	235.7	146.5
251		Signal Mtn	TN	A	AS	35-05-33	85-22-07	31.4	19.5
251	WVXA	Signal Mtn	TN	A	CP	35-05-15	85-21-50	31.1	19.3
252	W252	Florence	AL	D	AP	34-55-18	87-38-59	191.7	119.1
252	W252	Florence	AL	D	CP	34-47-50	87-39-54	193.2	120.1
252	WKEA	Scottsboro	AL	A	LI	34-35-22	85-59-31	49.7	30.9
252	WAWV	Sylacauga	AL	A	LI	33-12-23	86-13-54	193.2	120.1
252		Scottsboro	AL	A	AS	34-35-22	85-59-31	49.7	30.9
252		Sylacauga	AL	A	AS	33-12-23	86-13-54	193.2	120.1
252	WAWV	Sylacauga	AL	A	AP	33-12-23	86-13-54	193.2	120.1
252		Bowling Grn	KY	A	AS	37-02-45	86-21-53	253.9	157.8
252	WDNS	Bowling Grn	KY	A	LI	37-02-45	86-21-53	253.9	157.8
252	WDNS	Bowling Grn	KY	C3	AD	36-59-18	86-27-18	250.3	155.6
252	WDNS	Bowling Grn	KY	A	DE	37-02-45	86-21-53	253.9	157.8
252	WRJB	Camden	TN	A	LI	36-03-25	88-06-10	267.1	166.0
252	W244	Knoxville	TN	D	LI	35-59-17	83-57-59	191.3	118.9
252	WINJ	Pulaski	TN	A	LI	35-08-47	87-05-28	144.0	89.5
252	WDEH	Sweetwater	TN	A	LI	35-36-49	84-27-33	130.5	81.1
252	WDEH	Sweetwater	TN	A	AP	35-34-37	84-22-41	133.7	83.1
252		Pulaski	TN	A	AS	35-08-47	87-05-28	144.0	89.5
252		Sweetwater	TN	A	AS	35-36-49	84-27-33	130.5	81.1

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Chan	Call	City	State	CL	TYP	Latitude	Longitude	D(Km)	D(Mi)
253	W253	Birmingham	AL	D	LI	33-33-38	86-42-10	178.4	110.8
253		Atlanta	GA	C	AS	33-45-35	84-20-07	165.3	102.7
253	WSBF	Atlanta	GA	C	LI	33-45-35	84-20-07	165.3	102.7
253	WQXE	Elizabethtown	KY	A	DE	37-44-46	85-53-18	322.3	200.2
253		Elizabethtown	KY	A	AS	37-44-46	85-53-18	322.3	200.2
253	WQXE	Elizabethtown	KY	A	LI	37-44-46	85-53-18	322.3	200.2
253		Tupelo	MS	C	AS	34-18-09	88-42-21	295.6	183.7
253	WZLQ	Tupelo	MS	C1	LI	34-18-09	88-42-21	295.6	183.7
253	WZLQ	Tupelo	MS	C	CP	34-23-52	88-53-03	309.6	192.4
253		Kingsport	TN	C	AS	36-31-36	82-35-14	326.4	202.8
253	WHUB	Cookeville	TN	C2	LI	36-08-34	85-28-02	143.2	89.0
253	WTFM	Kingsport	TN	C	LI	36-31-36	82-35-14	326.4	202.8
253		Cookeville	TN	C2	AS	36-08-34	85-28-02	143.2	89.0
254	WLBI	Warrior	AL	A	CP	33-49-09	86-51-23	166.0	103.1
254	W254	Colbert Height	AL	D	LI	34-38-54	87-41-07	196.5	122.1
254		Warrior	AL	A	DE	33-48-14	86-56-38	173.0	107.5
254	WFFN	Cordova	AL	C3	AD	33-46-38	87-07-45	187.9	116.7
254		Warrior	AL	A	AS	33-50-13	86-48-36	161.5	100.4
254	WBTY	Homerville	GA	A	AD	31-02-24	82-51-50	492.8	306.2
254		Americus	GA	C3	AS	32-04-51	84-15-20	330.4	205.3
254	WISK	Americus	GA	C3	CP	32-04-51	84-15-20	330.4	205.3
254	WKDO	Liberty	KY	A	LI	37-18-22	84-55-02	278.0	172.7
254	WKDO	Liberty	KY	C3	CP	37-18-22	84-55-02	278.0	172.7
254		Hopkinsville	KY	C1	AS	36-52-54	87-30-44	286.1	177.8
254		Liberty	KY	C3	AS	37-18-22	84-55-02	278.0	172.7
254	WHOP	Hopkinsville	KY	C1	LI	36-52-54	87-30-44	286.1	177.8
254		Oliver Spring	TN	A	AS	36-07-16	84-24-05	175.2	108.9
254	WXVO	Oliver Spring	TN	A	LI	36-01-31	84-21-29	169.3	105.2
255	WBAM	Montgomery	AL	C	LI	32-24-11	86-11-48	278.4	173.0
255		Montgomery	AL	C	AS	32-24-11	86-11-48	278.4	173.0
255		Chatsworth	GA	A	AS	34-45-29	84-43-59	75.9	47.1
255	WQMT	Chatsworth	GA	A	LI	34-45-29	84-43-59	75.9	47.1
255	WQMT	Chatsworth	GA	A	CP	34-44-34	84-42-46	78.0	48.4
255		Brooksville	MS	C3	AD	33-24-45	88-29-25	314.6	195.5
255		Brooksville	MS	C3	AD	33-19-54	88-30-39	320.9	199.4
255	WSPA	Spartanburg	SC	C	LI	35-10-12	82-17-27	299.9	186.3
255		Spartanburg	SC	C	AS	35-10-12	82-17-27	299.9	186.3

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Chan	Call	City	State	CL	TYP	Latitude	Longitude	D(Km)	D(Mi)
255		Lebanon	TN	A	AS	36-17-28	86-16-14	172.1	107.0
255	WJFM	Lebanon	TN	A	CP	36-12-24	86-16-02	163.4	101.5
256	WAHR	Huntsville	AL	C	LI	34-47-53	86-38-24	99.6	61.9
256		Huntsville	AL	C	AS	34-47-53	86-38-24	99.6	61.9
256	WAYS	Macon	GA	C1	LI	32-45-10	83-33-32	297.4	184.8
256		Macon	GA	C1	AS	32-45-10	83-33-32	297.4	184.8
256		Edmonton	KY	A	AS	37-00-52	85-32-07	239.7	148.9
256	WK NK	Edmonton	KY	A	LI	37-01-33	85-33-14	240.9	149.7
256		Benton	KY	A	AS	36-51-30	88-20-13	335.6	208.5
256		Calvert City	KY	A	AD	37-01-54	88-20-54	349.2	217.0
256	WNOX	Loudon	TN	A	CP	35-47-10	84-17-24	154.6	96.0
256		Loudon	TN	A	AS	35-45-20	84-17-57	151.7	94.3
256	WNOX	Loudon	TN	A	LI	35-47-10	84-17-24	154.6	96.0
257	WKN	Lumpkin	GA	C2	AP	32-09-25	85-05-51	302.2	187.8
257	WCON	Cornelia	GA	C2	LI	34-31-24	83-40-46	175.6	109.1
257	WKN	Lumpkin	GA	C2	CP	32-09-25	85-05-51	302.2	187.8
257		Cornelia	GA	C2	AS	34-30-57	83-32-20	188.4	117.1
257		Lumpkin	GA	C2	AS	31-54-30	84-54-38	332.2	206.4
257		Harrodsburg	KY	A	AS	37-44-03	84-48-50	326.4	202.8
257		Scottsville	KY	A	AS	36-44-24	86-10-20	216.5	134.6
257	WHBN	Harrodsburg	KY	A	LI	37-44-03	84-48-50	326.4	202.8
257	WVLE	Scottsville	KY	A	LI	36-44-25	86-10-31	216.6	134.6
257		Booneville	MS	A	AS	34-38-21	88-34-33	277.8	172.6
257	WBIP	Booneville	MS	A	LI	34-38-21	88-34-33	277.8	172.6
257	W257	Donelson	TN	D	LI	36-10-28	86-40-09	178.0	110.6
257		Jefferson City	TN	A	AS	36-04-28	83-34-56	224.4	139.4
257		Lexington	TN	A	AS	35-38-05	88-23-34	272.5	169.3
257	WNDD	Jefferson City	TN	A	CP	36-04-28	83-34-56	224.4	139.4
257	W257	Donelson	TN	D	CP	36-10-28	86-40-09	178.0	110.6
257	WNDD	Jefferson City	TN	A	LI	36-04-28	83-34-56	224.4	139.4
257	WZLT	Lexington	TN	A	LI	35-38-05	88-23-34	272.5	169.3
201	NEW-	Huntsville	AL	D	AP	34-44-16	86-32-02	90.6	56.3
201	WUTC	Chattanooga	TN	C1	LI	35-12-28	85-16-46	46.5	28.9
201	WUTC	Chattanooga	TN	C1	CP	35-12-28	85-16-46	46.5	28.9



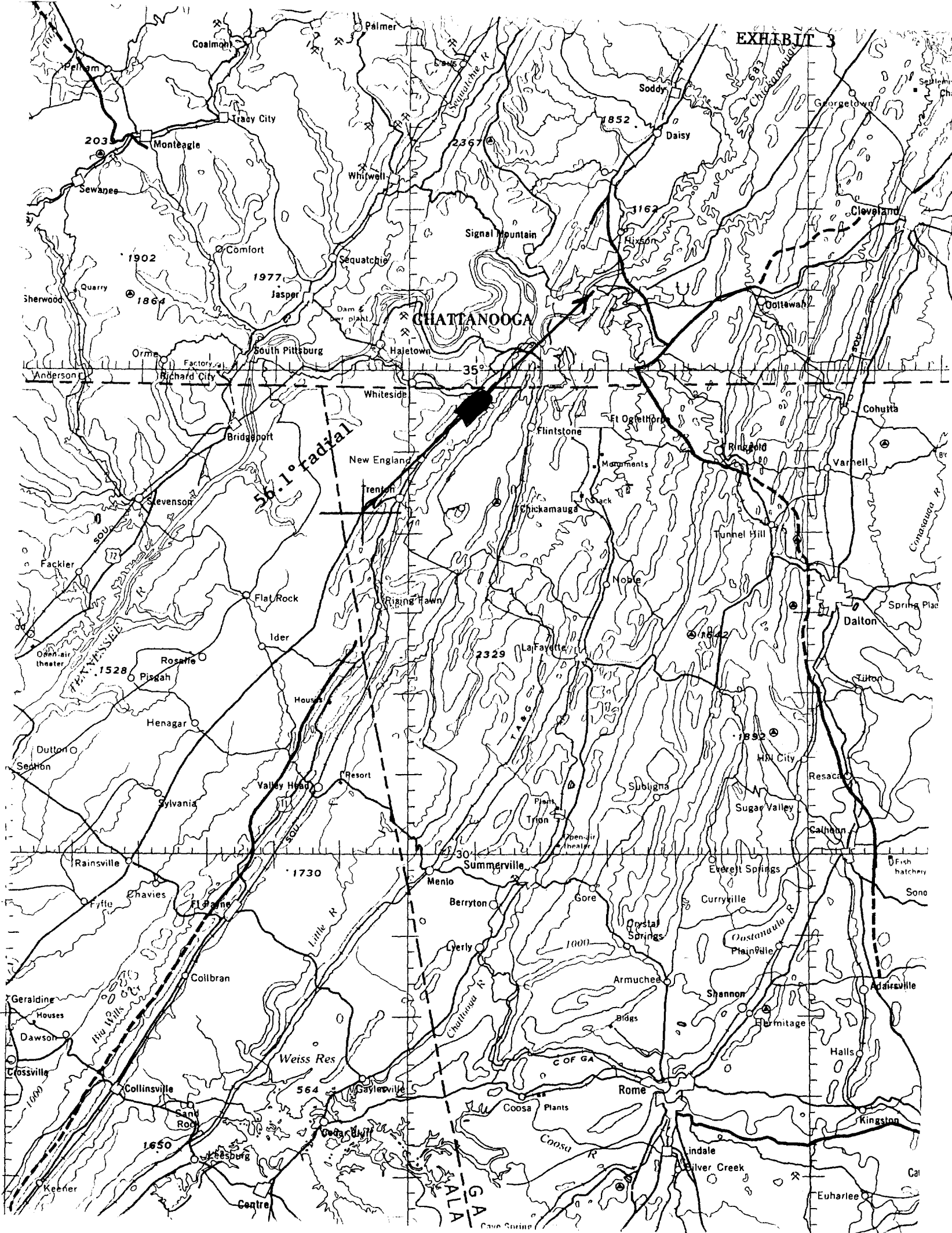


EXHIBIT 4**LOOKOUT MOUNTAIN BROADCASTING
CONTOUR CALCULATIONS: Channel 254 A**

AZIMUTH, DEGREES	ERP, KW. ERP, DBK	HAAT (ft) HAAT (m)	3.16/50% 69.99	mV/m,% dbu
0	6 7.78	231.95 70.699	8.6443 13.912	Mi Km
45	6 7.78	824.79 251.4	16.48 26.522	Mi Km
90	6 7.78	172.24 52.499	7.5509 12.152	Mi Km
135	6 7.78	-34.776 -10.6	5.7457 9.2468	Mi Km
180	6 7.78	562.99 171.6	13.753 22.133	Mi Km
225	6 7.78	211.28 64.399	8.3859 13.496	Mi Km
270	6 7.78	372.04 113.4	10.759 17.315	Mi Km
315	6 7.78	283.79 86.5	9.2923 14.955	Mi Km

AREAS, Sq Mi. : 352.61
AREAS, Sq Km. : 913.22

HEIGHT ABOVE AVERAGE TERRAIN = 328.03 ft
= 99.98 m

ALL CONTOURS DETERMINED BY BIVARIATE INTERPOLATION OF
DATA FROM APPROPRIATE FCC F(50,50) AND F (50,10) CURVES.

FM BLANKETING CONTOUR 115 DBU = .60 MILES, .97 KM.
CALCULATED PURSUANT TO R&R 73.318(A) FOR MAXIMUM ERP.